Case 1:23-cr-00155-AT Document 13 Filed 04/07/2

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April 7, 2023

## VIA ECF

The Honorable Analisa Torres United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

> Re: United States v. John Roesser 23 Cr. 155 (AT)

Dear Judge Torres:

I represent Mr. John Roesser in his defense of the above-referenced matter. For the reasons that follow, I write to respectfully request that Your Honor grant a modification of Mr. Roesser's bond conditions to require only one co-signer on his bond. I have consulted with A.U.S.A. Kochevar regarding this request, and the Government advised that it consents to the proposed bond modification.

On March 28, 2023, Mr. Roesser appeared before United States Magistrate Judge Robert W. Lehrburger for his initial appearance. On consent of the parties, Judge Lehrburger set conditions of release on a \$250,000.00 personal recognizance bond to be co-signed by two financially responsible persons. The bond is secured by Mr. Roesser's motor vehicle. Judge Lehrburger also set the following conditions of release: supervision by United States Pretrial Services ("Pretrial"), as directed by Pretrial; continue or seek employment; surrender all travel documents and not submit any applications for new documents; travel restricted to the Southern and Eastern Districts of New York; and location monitoring as directed by Pretrial.

During the presentment, the Government advised the Court that it may consent to having only one co-signer on the bond, but that it needed to review the proposed co-signer prior to making a final determination. On April 6, 2023, A.U.S.A. Steven Kochevar advised the defense that, based upon the Government's review of the proposed co-signer, one co-signer on the bond will be sufficient. Therefore, I respectfully request that Honor grant a modification of Mr.

## Case 1:23-cr-00155-AT Document 13 Filed 04/07/23 Page 2 of 2

## Cohen, Frankel & Ruggiero, LLP

The Honorable Analisa Torres April 7, 2023 Page 2 of 2

Roesser's bond conditions to require only one co-signer. Thank you for your consideration of this request.

Respectfully submitted,

Mark I. Cohen

MIC/gmf

Cc: A.U.S.A. Steven Kochevar (via ECF)

Mr. John Roesser (via email)

GRANTED.

SO ORDERED.

Dated: April 7, 2023

New York, New York

ANALISA TORRES United States District Judge